

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK

JUICY COUTURE, INC.,

Plaintiff,

v.

BELLA INTERNATIONAL LIMITED, a/k/a
BELLA (d/b/a JUICY GIRL and JUICYLICIOUS),
JUICY GIRL, LTD., GOLD STABLE
INTERNATIONAL LTD., GOLDSTABLE
INTERNATIONAL CORPORATION, JOHN
SUEN, ALISON LAW, JESSICA CHING PING
YANG and JOHN DOES 1-10,

Defendants.

No. 12-cv-05801(RA)(HP)

**NOTICE OF MOTION
FOR PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE that upon the Declarations Craig Samuelson, Tamara D. Tarbutton, Kris Buckner, and Nancy Munno, and the exhibits attached thereto; the accompanying Memorandum of Law; and all prior pleadings and proceedings had herein, Plaintiff Juicy Couture, Inc. ("Plaintiff" or "Juicy Couture") will move before the Honorable Judge Ronnie Abrams, United States District Judge for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, Courtroom 9B, New York, New York 10007, on September 28, 2012 at 11:00 a.m. or as soon thereafter as counsel may be heard, for an order preliminarily enjoining defendants Bella International Limited, a/k/a Bella, d/b/a Juicy Girl and Juicylicious, Juicy Girl Group, Ltd., Gold Stable International Ltd., Goldstable International Corporation, John Suen, Alison Law, and Jessica Ching Ping Yang ("Defendants"),


during the pendency of this Action, from:

- (i) using the JUICY Marks (as defined in Plaintiff's Complaint, ¶¶ 13-14), or any reproduction, counterfeit, copy or colorable imitation of the JUICY Marks in connection with the distribution, advertising, offer for sale and/or sale of merchandise not the genuine products of Plaintiff; and
- (ii) passing off, inducing or enabling others to sell or pass off any infringing products as and for Juicy Couture products; and
- (iii) shipping, delivering, holding for sale, distributing, returning, transferring or otherwise moving, storing or disposing of in any manner apparel or other items falsely bearing the JUICY Marks, or any reproduction, counterfeit, copy or colorable imitation of same; and
- (iv) utilizing the Infringing Domains (as defined in Plaintiff's Complaint, ¶¶ 26-27) and registering any additional domain names that use or incorporate any of the JUICY Marks; and

further ordering, to effect the requested relief, that, during the pendency of this Action, Defendants' websites utilizing the Infringing Domains and/or the corresponding domain names be disabled by the appropriate domain name registries or registrars.

Pursuant to Local Rule 6.1(b), any opposing affidavits and answering memoranda of law shall be served within fourteen days after service of the moving papers, and any reply affidavits and reply memoranda of law shall be served within five days after service of the answering papers.

Dated: New York, NY
August 24, 2012

By: /s/ 
G. Roxanne Elings
Charles A. LeGrand
George P. Wukoson

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